

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

VENDOR CREDENTIALING SERVICE LLC,
d/b/a SYMPLR, n/k/a SYMPLR SOFTWARE
LLC,

Plaintiff,

v.

EPISODE SOLUTIONS, LLC,

Defendant.

Civil Action No. 3:25-cv-00091

**MOTION FOR ENTRY OF
DEFAULT**

Plaintiff Vendor Credentialing Service LLC, d/b/a symplr, n/k/a symplr Software LLC (“symplr”), by and through its counsel Hogan Lovells US LLP, requests that the Court or Clerk of this Court enter default against Defendant Episode Solutions, LLC (“Episode”), pursuant to F.R.C.P. 55(a) and L.R. 55.01. In support of this Motion, symplr states as follows:

1. symplr filed its Complaint on January 23, 2025.
2. According to the Tennessee Secretary of State’s Business Entity Database, Episode’s registered agent is the Corporation Service Company, located at 2908 Poston Ave, Nashville, TN 32703. **Exhibit 1.** symplr served Episode’s registered agent with the Summons and Complaint on February 5, 2025. The Proof of Service is attached hereto as **Exhibit 2.**
3. Pursuant to F.R.C.P. 12(a), Episode was required to answer or otherwise respond to the Complaint on or before February 26, 2025. *See* F.R.C.P. 12(a) (“A defendant must serve an answer: (i) within 21 days after being served with the summons and complaint.”).

4. Episode has failed to answer or otherwise respond to the Complaint within the time provided by F.R.C.P. 12(a). It is therefore appropriate for the Clerk to enter default against Episode on symplr's Complaint pursuant to F.R.C.P. 55(a).

5. In support of this Motion, symplr attaches a declaration certifying the above statements. **Exhibit 3.**

WHEREFORE, for the reasons set forth herein, symplr respectfully requests that the Court or Clerk of this Court enter default against Episode pursuant to F.R.C.P. 55(a), as set forth above, and for such other and further relief as this Court deems just and proper.

Dated: February 28, 2025

Respectfully submitted,

HOGAN LOVELLS US LLP

/s/ Allison M. Ryan
Allison M. Ryan (BPR 028584)
Columbia Square
555 Thirteenth Street, N.W.
Washington, D.C. 20004
Tel: (202) 637-5600
Fax: (202) 637-5910
allison.holt-ryan@hoganlovells.com

Jeffrey S. George*
David A. Willner
Two North Cascade Avenue, Suite 1300
Colorado Springs, CO 80903
Tel: (719) 448-5900
Fax: (719) 448-5922
jeffrey.george@hoganlovells.com
david.willner@hoganlovells.com
**Pro hac vice application pending*

Counsel for Plaintiff symplr

CERTIFICATE OF SERVICE

I hereby certify that the foregoing will be served via certified mail upon Defendant's registered agent.

/s/ Allison M. Ryan

Allison M. Ryan